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DOE-FEMP MSL #531-0297 RA 17 PROPOSED CHANGES -  
COMMENTS

07/28/94

OEPA            DOE-FN  
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COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

July 28, 1994

RE: DOE FEMP  
MSL #531-0297  
RA 17 PROPOSED CHANGES-  
COMMENT

Mr. Jack Craig  
Project Manager  
U.S. DOE FEMP  
P.O. Box 398705  
Cincinnati, OH 45329-8705

Dear Mr. Craig:

This letter provides Ohio EPA's concerns regarding "Proposed Changes to the Removal Action 17 Improved Storage of Soil and Debris" submitted to the agency on May 31, 1994. Ohio EPA is concerned that the proposed relocation of the CSF and subsequent delay may already be outdated. DOE needs to provide a justification for the relocation in light of recent finding of OU5 which suggest that the usefulness of soil washing is very limited. Additionally, it would seem appropriate if the CSF will actually be a staging facility for disposal that it should be located based upon accessibility to the disposal cell.

It was Ohio EPA's understanding that the CSF would provide interim storage for debris and soils generated by other removal actions and the OU3 Interim Remedial Action. The delay in construction of this facility questions its usefulness for this purpose. At this point it may be more appropriate for the agencies and DOE to discuss design of facilities which will act as staging areas for OU3 and OU5 remedial actions. Regardless of what the facility is called interim storage or staging, a discussion of the objectives of this facility should occur prior to any additional design activities.

Ohio EPA concurs with DOE's position regarding the TSS covers for the decon pad and scrap metal pad. Ohio EPA is available to discuss this issue with DOE and USEPA. If you should have any questions, please contact me.

Sincerely,

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

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cc: Jim Saric U.S. EPA  
Ken Alkema, FERMCO  
Robert Owen, ODH  
Jean Michaels, PRC  
Jenifer Kwasniewski, DERR  
Lisa August, GeoTrans